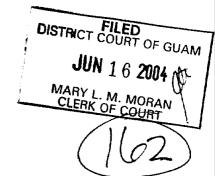
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Attorneys for Plaintiffs Alan Sadhwani, et al.



IN THE UNITED STATES DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU SADHWANI, and K. SADHWANI'S INC., a Guam corporation,) CIVIL CASE NO. 03-00036)
Plaintiffs, vs.) DECLARATION OF JOAQUIN C. ARRIOLA IN SUPPORT OF PLAINTIFFS' MOTION TO COMPEL
HONGKONG AND SHANGHAI BANKING CORPORATION, LTD., a Foreign corporation, JOHN DOE I through JOHN DOE X,	 DEPOSITIONS OF FRED GRANILLO AND CHRIS UNDERWOOD AND FOR SANCTIONS
Defendants.)))

JOAQUIN C. ARRIOLA declares:

- 1. I am one of the attorneys for the plaintiffs Alan Sadhwani, et al. in the above-entitled case. I make this Declaration in support of Plaintiffs' Motion to Compel Depositions of Fred Granillo and Chris Underwood and for Sanctions. I have personal knowledge of the facts contained herein.
- 2. I researched and draft the Motion to Compel the Depositions of Messrs. Granillo and Underwood and the Motion for Sanctions, as well as the Reply Memorandum in Support of the Motion to Compel and for Sanctions. I spent a total of 8.7 hours researching and drafting the motion

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to compel and the reply memorandum in support of the motion to compel. My regular hourly billing rate is \$280 per hour. We are seeking a total of \$2,436.00 for the amount of time I spent on plaintiffs' motion to compel depositions of Messrs. Granillo and Underwood and for Sanctions.

3. Our Associate Jacqueline Terlaje also assisted me in the drafting the reply memorandum in support of the motion to compel depositions and for sanctions. I reviewed her billings; she spent a total of 6.8 hours in the research and drafting of the reply memorandum in support of the motion to compel and for sanctions. Ms. Terlaje's regular hourly billing rate for this firm is \$175.00 per hour. We are seeking a total of \$1,190.00 for Ms. Terlaje's time spent on this matter.

I declare under penalty of perjury under the laws of Guam and the United States that the foregoing is true and correct.

Dated this 16th day of June, 2004.

JOAQUIN C. ARRIOLA

CERTIFICATE OF SERVICE

I, JOAQUIN C. ARRIOLA, hereby certify that on June 16, 2004, I caused to be served via hand delivery, a **DECLARATION OF JOAQUIN C. ARRIOLA IN SUPPORT OF PLAINTIFFS MOTION TO COMPEL DEPOSITIONS OF FRED GRANILLO AND CHRIS UNDERWOOD AND FOR SANCTIONS** to:

Jacques A. Bronze, Esq. Bronze & Tang, P.C. 2nd Floor, BankPacific Building 825 S. Marine Drive Tamuning, Guam 96913

Dated this 16th day of June, 2004.

JOAQUIN C. ARRIOLA